

Planning Committee

Graham Margery - Co Chairman

Planning Activity: Over the last twelve months the Dover Society Planning Committee reviewed some 205 planning applications that are potentially of interest and made formal response to the Local Authority in respect of 71 of them. Since the last newsletter, we have reviewed some 62 applications and made response in respect of 20 of them. This is a much lower level of activity than usual and, whilst making the workload easier, is of some concern as mentioned below. As ever we would encourage members to look at planning applications that may be of interest to them and make comment to Dover District Council as they feel appropriate, or contact our Planning Committee with their views. Applications can be found on the DDC website or the Dover Society Website under Planning. We are also looking for new members to join our small team, so if you are interested in town planning please get in touch.

Housing: There has been a lot of comment in the media recently that the Government's much vaunted housing target of 1.5 million new homes by 2029 is likely to be missed despite reforms to the planning system, particularly the National Planning Policy Framework (NPPF). We referred to this in issue 111 of our newsletter and submitted our comments to government through the public consultation process. Although many of the problems with the planning system and house building arise nationwide, there are some problems that relate particularly in the Dover area. For example, Dover is an area of social deprivation which results in house prices being generally lower than elsewhere in the country. This means that the potential

profit margin for a developer is generally lower than would otherwise be the case. This is a serious disincentive for a developer to proceed with house building or even submit a planning application in the first place. The planning regulations and housing targets make absolutely no difference. The problem is made worse by the requirement for expensive archaeological investigations where there is likely to be buried remains that need to be explored and recorded. With Dover's very long and rich history, this frequently arises.

One possible way of circumventing the developer's profit motive problem is for the Local Authority to take control of the potential development land using compulsory purchase powers. A suitable housing scheme could then be taken through to completion and sold on at lower profit margin than a commercial developer would expect. Such a scheme would require the formation of a central fund that could be accessed by the Local Authority and repaid at a later date. We intend to write to the Minister of State at the Ministry of Housing, Communities and Local Government on this subject.

Here are some examples of current problems. In September 2020, an outline planning application was submitted for 135 dwellings on the former Buckland Mill site. Planning permission was granted in December 2023 but no application has been made for the full planning permission that would enable the work to proceed. Also, in December 2018, a planning application was submitted to convert the former magistrates' court in Pencester Road to 46 flats. Planning permission was granted in

July 2019 but no work has started. Planning permission has now expired and the building is falling into dilapidation. It's not that the planning system has delayed their approval, but that the developer is not wanting to proceed.

HMOs: We have frequently criticised the uncontrolled proliferation of Houses in Multiple Occupancy (HMOs) in Dover and, sadly, the situation is only getting worse. Only HMOs for more than six people need planning permission for change of use and have to be registered, but smaller ones do not. This means that the numbers we have previously quoted do not tell the whole story. Of course, the provision of low-cost accommodation is important, but it should be part of a balanced mix of housing. Such a predominance of accommodation at the "bottom end" of the market serves to depress house prices generally and discourages the development of better-quality homes, to the detriment of the overall prosperity of the town. Other problems include increased pressure on local services and infrastructure, issues with anti-social behaviour, parking congestion, waste management, a decline in community cohesion and higher levels of resident turnover.

We are delighted to say that the Town Council has taken the initiative to try to bring the situation under better control. Having researched best practice in other Local Authorities, they have written to DDC to seek the application of Article 4 Directions, so that Planning Permission is required for all HMO conversions that include limits to the density HMOs in a particular area. We applaud this initiative. DDC's website gives the following explanation:- An Article 4 direction made by the local planning authority restricts the scope of permitted development rights either in relation to a particular area or site,

or a particular type of development anywhere in the authority's area. Where an Article 4 direction is in effect, a planning application may be required for development that would otherwise have been permitted development. Article 4 directions are used to control works that could threaten the character of an area of acknowledged importance, such as a conservation area. This enables the council to control these minor developments so as to ensure that they accord with its policies to protect the character of a Conservation Area or the visual amenities of other areas and prevent developments that do not accord with those policies. This may take time to implement and may require public consultation, but we see this as an important step forward that gives the local authority the necessary tools to take control.

Update on Planning Applications: The controversial development on the site of the former leisure centre at the junction of Woolcomber Street and Townwall Street has been granted planning permission for a drive-through takeaway restaurant. This is the second such approval, with the application having been referred back to the planning committee after the first decision was challenged. There are 34 planning conditions attached to the decision which include measures to protect trees and wildlife as well as measures concerning drainage, parking, boundaries, litter and road layout. There is also a requirement for archaeological excavations. Sadly, there is no mention of a Section 106 public realm improvement contribution, but this may come later.

An application to replace dilapidated windows and doors with uPVC to a property in High Street, which we objected to has been refused. This is a Grade II Listed Building where repairs or like for like replacements are required in order to

maintain the historic integrity of the building, which in this case would mean timber construction. This is no doubt disappointing and even very annoying to the applicant, but we consider it to be of great importance that Dover's heritage is protected wherever possible, since so much of it has been lost over the years.

Applications to make further improvements to the Dover Marina Hotel have been approved. This also is a Grade II Listed Building, but the changes are sympathetic to the building as a whole and will help ensure the sustainability of the hotel. We supported the application.

Port of Dover: Dover Harbour Board has made application for a Harbour Revision Order. Many of the provisions affect operational matters within and around the harbour which do not concern us but there is also a change to the composition of the Board which is of concern. The proposal is to reduce the number of Board members appointed by the Secretary of State from 3 to 1 and increase the number appointed by the Board from 3 to 5. This includes the removal of the two so called "community directors" who have been in place for nearly ten years. The loss of this kind of input to the Board's discussions and decisions we regard as very much to the detriment of the town. We have

therefore written to the Marine Management Organisation to object.

The Bench: This new development (formally the Beacon Project) in Bench Street is progressing rapidly and in September reached a key milestone in the completion of the highest part of the building. To mark the occasion, a "Topping Out" ceremony was held in which Town and District Council officials, the contractors and other key partners including the Dover Society were given a tour of the work in progress. In his speech, the Leader of Dover District Council, Cllr Kevin Mills, explained that the building will provide for an education campus, business centre and creative centre, as well as public spaces including a café. It will provide an attractive link to the Market Square and the sea front. We would have preferred to see the older buildings restored and repurposed rather than demolished, but, when that proved to be impossible, we have engaged in the public consultation process at every opportunity to try and ensure the best possible outcome in the circumstances. What we have is undoubtedly modern and, unsurprisingly, rather controversial but it will provide an attractive link from the St James' area to this end of the Town.

We have recently been working with DDC's Regeneration Delivery Manager on a Heritage Interpretation Strategy. This was one of the planning conditions attached to the granting of planning permission and we regard this as vitally important since so many of the historic streets and buildings in this area have been lost.

Linked to this project is the redevelopment of the underpass under the A20. Already colourful new display panels are being put up that depict scenes of Dover's rich history and this is proving to be of interest to those passing through.



The Bench